

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROMAN SELEZNEV,

Defendant

Case No.: CR 11-70 RAJ

DEFENDANT'S PROPOSED *VOIR DIRE*  
QUESTIONS

TRIAL DATE: AUGUST 15, 2016

Defendant Roman Seleznev, by and through his attorneys John Henry Browne and Emma. C Scanlan, hereby proposes that the Court ask potential jurors the following *voir dire* questions:

**TRAINING, EDUCATION AND EXPERIENCE**

1. Do you have any specialized training, education or experience in the following areas:
  - a. Law?
  - b. Computer Science? (computer forensics, engineering, programming, etc.)
  - c. Law Enforcement?
  - d. Criminal Investigations?
  - e. Electronic Data Security?
  - f. National Security?
2. Do you have any family members or friends with specialized training, education or experience in the following areas?

- a. Law?
- b. Computer Science? (computer forensics, engineering, programming, etc.)
- c. Law Enforcement?
- d. Criminal Investigations?
- e. Electronic Data Security?
- f. National Security?

3. Are you able to speak or write in the Russian language?

**CRIMINAL JUSTICE SYSTEM**

4. Have you ever been the victim of a property or theft crime?
5. Do you know anyone who has been the victim of a property or theft crime?
6. Have you ever been the victim of identity theft or had charges on your credit card that were not yours?
7. Do you know anyone who has been the victim of identity theft or had charges made to their credit card that were not theirs?
8. Have you ever been the victim of computer hacking?
9. Do you know anyone who has been the victim of computer hacking?
10. Have you ever discovered malware on a personal or work computer you used?
11. Do you know anyone who has discovered malware on a personal or work computer they used?
12. Do you have any negative feelings towards the legal system, prosecutors, defense lawyers, or the process generally?
13. Do you know any lawyers, paralegals, or investigators on a personal, professional, or casual basis?
14. Do you know any Judges, court clerks, court reporters, or bailiffs on a personal, professional, or casual basis?
15. Do you know any police officers, federal agents, or any other persons involved in law enforcement on a personal, professional, or casual basis?
16. Has anyone personally, or know anyone who has ever worked for any prosecuting attorney's office, criminal defense attorney, law enforcement office, or police agency?

1 17. Have had had a particularly positive or particularly negative experience with law  
2 enforcement?

3 **KNOWLEDGE OF ANY PERSONS/LOCATIONS INVOLVED WITH THIS CASE**

4 18. Does anyone know any of the following people: (government and defense witness lists)?

5 19. Does anyone know the Judge assigned to this case?

6 20. Does anyone know the following Assistant United States Attorneys assigned to this case:

7 a. Norman Barbosa?

8 b. C. Seth Wilkenson?

9 c. Harold Chun?

10 21. Does anyone know the following Defense Attorneys in this case:

11 a. John Henry Browne?

12 b. Emma Scanlan?

13 22. Does anyone know any other member of the jury panel?

14 23. Has anyone been a customer, know anyone who is employed at, or have any affiliation  
15 with the following businesses:

16 a. Mad Pizza – Madison Park in Seattle, Washington?

17 b. Mad Pizza – First Hill in Seattle, Washington?

18 c. Mad Pizza – South Lake Union in Seattle, Washington?

19 d. Mad Pizza – Starfire in Tukwila, Washington?

20 e. Casa Mia Italian Pizzeria in Yelm, Washington?

21 f. Village Pizza in Anacortes, Washington?

22 g. Red Pepper Pizzeria in Duvall, Washington?

23 h. Grand Central Baking Company in Seattle, Washington?

24 i. Broadway Grill in Seattle, Washington?

**LEGAL RULES IN THIS CASE**

24. The fact that Roman Seleznev is charged with a crime is not evidence that he is guilty of the crimes charged. Is anyone unwilling to accept and abide by this rule of law?
25. Does anyone have any strong feelings about people simply because they have been charged with a crime?
26. Does anyone believe that if a person is charged with a crime, they are more likely than not to have committed that crime?
27. Any person charged with a crime must be proven guilty beyond a reasonable doubt before they can be convicted of that crime. In other words, if the Government does not prove guilt beyond a reasonable doubt, you must find the Defendant not guilty. Is anyone unwilling to accept and abide by this rule of law?
28. The Defendant, Roman Selevnev, has no obligation to testify, present evidence or prove his innocence. The entire burden to prove Mr. Seleznev is guilty beyond a reasonable doubt is on the Government. Is anyone unwilling to accept and abide by this rule of law?

**MEDIA ISSUES**

29. Has anyone read, seen or heard any news reports, articles, online forums, or information related to this case and/or the Defendant, Roman Seleznev?
30. If anyone has knowledge of this case and/or the Defendant Roman Seleznev, when was the last time they read, saw, or heard any news reports or articles related to this case or Mr. Seleznev?
31. Does anyone know anything about this case or the Defendant, Roman Seleznev, from any source besides the media?
32. Has anyone personally formed an opinion about Roman Seleznev's innocence or guilt as a result of anything they have heard, read or seen?
33. Has anyone discussed this case or talked about the Defendant with anyone?

DATED this 25th day of July, 2016.

Respectfully submitted,

s/ John Henry Browne

JOHN HENRY BROWNE, WSBA #4677

s/ Emma C. Scanlan

EMMA C. SCANLAN, WSBA #37835

1 LAW OFFICES OF JOHN HENRY BROWNE, PS  
2 Attorneys for Roman Seleznev  
3 200 Delmar Building  
4 108 South Washington Street  
5 Seattle, WA 98104  
6 206.388.0777 fax: 206.388.0780  
7 Email: johnhenry@jhblawyer.com  
8 emma@jhblawyer.com  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of filing to all registered parties.

s/Emma C. Scanlan  
Emma C. Scanlan, WSBA #37835